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ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CLERK OF DISTRICT COURT  
NORTHERN DIST. OF TX  
DALLAS

2011 FEB 8 PM 4:01

DEPUTY CLERK *DB*

UNITED STATES OF AMERICA

v.

THOMAS W. RICHARDSON (1)

§  
§  
§  
§  
§

No.

**3-11-CR-035-B**

INDICTMENT

The Grand Jury charges:

At all times material to this indictment:

1. The Internal Revenue Service ("IRS") was and is an agency of the U.S. Department of the Treasury, which was responsible for determining, assessing, and collecting taxes for the United States.

2. A Taxpayer Identification Number ("TIN") is an identification number used by the IRS in the administration of tax laws. TINs consist primarily of social security numbers ("SSNs") and Employer Identification Numbers ("EINs"). SSNs are issued to U.S. citizens and resident aliens while EINs are used to identify business entities. TINs must be furnished on tax returns, statements to the IRS, and other tax related documents.

Counts One Through Five  
False Claim for Refund  
(Violation of 18 U.S.C. §§ 287 & 2)

1. The Introduction to the indictment is realleged and made part of these counts.

2. On or about the date stated as to each count listed below, in the Northern District of Texas and elsewhere, defendant **Thomas W. Richardson** knowingly made and presented, and caused to be made and presented, to the Internal Revenue Service, an agency of the United States Department of Treasury, claims against the United States for payment, which he knew to be false, fictitious and fraudulent, by preparing and causing to be prepared, and filing and causing to be filed, with the Internal Revenue Service what purported to be an IRS Form 1040, U.S. Individual Income Tax Return, for tax year 2005 for himself and the individuals named below, wherein claims for income tax refunds for the amounts listed below were made, with knowledge that such claims were false, fictitious, and fraudulent.

Count	Date of Offense	Taxpayers	Amount Claimed
1	4/16/2006	S.G./S.G.	\$226,190
2	4/16/2006	H.H./H.H.	\$294,883
3	4/16/2006	A.W./S.J.	\$249,462
4	4/16/2006	D.W./M.W.	\$257,950
5	8/17/2006	Thomas W. Richardson/L.R.	\$1,675,673

In violation of 18 U.S.C. §§ 287 & 2.

Counts Six Through Twelve  
 Theft of Government Property  
 (Violation of 18 U.S.C. §§ 641 & 2)

1. The Introduction to the indictment is realleged and made part of these counts.
2. On or about the dates set forth below, in the Northern District of Texas and elsewhere, defendant **Thomas W. Richardson** stole, and knowingly converted to his use and the use of another, money and property of the United States, that is the tax refunds set forth below, with intent to convert said money and property to his own use:

Count	Date of Offense	Account	Social Security Number	Refund Received from the IRS
6	5/12/2006	3950	xxx-xx-3304	\$283,126
7	5/19/2006	3950	xxx-xx-7657	\$256,542
8	5/19/2006	3950	xxx-xx-9486	\$277,286
9	5/19/2006	0725	xxx-xx-4044	\$273,262
10	5/19/2006	3950	xxx-xx-4076	\$246,862
11	5/19/2006	3950	xxx-xx-6115	\$232,940
12	5/19/2006	3950	xxx-xx-9623	\$294,883

In violation of 18 U.S.C. §§ 641 & 2.

Count Thirteen  
Aggravated Identity Theft  
(Violation of 18 U.S.C. §§ 1028A & 2)

1. The Introduction to the indictment is realleged and made part of this count.
2. On or about April 17, 2006, in the Northern District of Texas and elsewhere, defendant **Thomas W. Richardson** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, a name and SSN of another person, S.W., during and in relation to the theft of government property in violation of 18 U.S.C. § 641, as charged in Count Eight of this indictment.

In violation of 18 U.S.C. §§ 1028A & 2.

Count Fourteen  
Aggravated Identity Theft  
(Violation of 18 U.S.C. §§ 1028A & 2)

1. The Introduction to the indictment is realleged and made part of this count.
2. On or about April 17, 2006, in the Northern District of Texas and elsewhere, defendant **Thomas W. Richardson** did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, a name and SSN of another person, J.W., during and in relation to the theft of government property in violation of 18 U.S.C. § 641, as charged in Count Nine of this indictment.

In violation of 18 U.S.C. §§ 1028A & 2.

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON

JAMES T. JACKS  
UNITED STATES ATTORNEY



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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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THE UNITED STATES OF AMERICA

v.

THOMAS W. RICHARDSON (1)

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INDICTMENT

18 USC §§ 287 and 2  
False Claim for Refund

18 USC §§ 641 and 2  
Theft of Government Property

18 USC §§ 1028A and 2  
Aggravated Identity Theft

14 Counts

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A true bill rendered

DALLAS

  
FOREPERSON

Filed in open court this \_\_\_\_\_ day of February, 2011

\_\_\_\_\_  
Clerk

Warrant to Issue

 2/8/11  
\_\_\_\_\_  
UNITED STATES DISTRICT/MAGISTRATE JUDGE

No Criminal Complaint Pending

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**

**Related Case Information**

Superseding Indictment: ☐ Yes ☒ No

New Defendant: ☒ Yes ☐ No

Pending CR Case in NDTX: ☐ Yes ☒ No (If yes, CR #:)

Search Warrant Case Number: \_\_\_\_\_

Rule 20 from District of: \_\_\_\_\_

Magistrate Case Number: \_\_\_\_\_

**1. Defendant Information**

Juvenile: ☐ Yes ☒ No

Matter to be sealed:

☐ Yes ☒ No

Defendant Name

Thomas W. Richardosn (1)

Alias Name

Address

County in which offense was committed:

Dallas

**2. U.S. Attorney Information**

Robert Kemins

Bar # MA 267330

**3. Interpreter**

☐ Yes ☒ No

If Yes, list language and/or dialect: \_\_\_\_\_

**4. Location Status WARRANT TO ISSUE**

- ☐ Already in Federal Custody  
☐ Already in State Custody  
☐ On Pretrial Release

**5. U.S.C. Citations**

Total # of Counts as to This Defendant: 14

☐

Petty

☐

Misdemeanor

☒

Felony

**Citation**

**Description of Offense Charged**

**Count(s)**

18 USC §§ 287 and 2

False Claim for Refund

1-5

18 USC §§ 641 and 2

Theft of Government Property

6-12

18 USC §§ 1028A and 2

Aggravated Identity Theft

13, 14

Date

2-8-11

Signature of AUSA:

